

Remarks

Claims 2, 4-5, 7, and 14 were rejected as unpatentable over OVADIA 2004/0208544 in view of KARRI et al. 2002/0196808 and BLACK et al. 6,614,796. Claims 3, 6, and 8 were rejected as unpatentable further in view of NOMURA et al. 7,133,402. Reconsideration and withdrawal of the rejections are respectfully requested.

Claims 2 and 14 include "a plurality of switch controllers controlling a plurality of switch devices, respectively, each of said plurality of switch devices including at least one port." That is, (in view of the word "respectively") each switch controller provides control specific to each switch. As explained on page 20 of the specification, this feature facilitates modification of the hardware configurations, where each switch controller can be configured to be dedicated to each switch.

The Official Action asserts that OVADIA discloses a plurality of switch controllers controlling a plurality of switch devices, respectively, and refers to Figure 8 in support. However, this reference does not disclose a "plurality of switch controllers." The network processor 83 of OVADIA performs label swapping and corresponds to the resource manager of the present invention. Apparently, the Official Action regards the photonic burst switches 32 as switch controllers and switch devices. However, this is not correct because the photonic burst switches

are controlled by the control interface unit 81 (paragraph 0067), and because the glue logic 85, which receives timing and control signals from the network processor 83, is provided between the network processor 83 and the photonic burst switches 32. One of skill in the art would see that Figure 8 discloses a plurality of switch devices (i.e., the photonic burst switches 32) controlled by only one switch controller - the glue logic 85.

As further evidence of but a single switch controller, OVADIA makes no provision for the selection of a switch controller. That is, OVADIA does not disclose selecting a target switch controller from the alleged plurality of switch controllers; OVADIA's I/F unit does not require selection of a switch controller.

Accordingly, the combination does not disclose all the features of at least claims 2 and 14 and the claims avoid the rejections under §103.

In view of the foregoing remarks, it is believed that the present application is in condition for allowance. Reconsideration and allowance are respectfully requested.

The Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 25-0120 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17.

Respectfully submitted,

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